

Message

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**From:** Llamozas, Emilio [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C57FB13DFE464567903F91D33CB0ABA5-LLAMOZAS, EMILIO]  
**Sent:** 3/30/2022 8:44:29 PM  
**To:** Ed Coleman [ECOLEMAN@helenamt.gov]; Leea Anderson [LANDERSON@helenamt.gov]  
**CC:** Garcia, Al [garcia.al@epa.gov]  
**Subject:** RE: City of Helena Submittal for Paragraphs 89 and 90 of the Compliance Order - Part 2

That is a great idea. I will send out a Teams invite. Thanks

Emilio Llamozas  
(303) 312-6407 phone  
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<https://echo.epa.gov/report-environmental-violations>

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**From:** Ed Coleman <ECOLEMAN@helenamt.gov>  
**Sent:** Wednesday, March 30, 2022 1:59 PM  
**To:** Llamozas, Emilio <Llamozas.Emilio@epa.gov>; Leea Anderson <LANDERSON@helenamt.gov>  
**Cc:** Garcia, Al <garcia.al@epa.gov>  
**Subject:** RE: City of Helena Submittal for Paragraphs 89 and 90 of the Compliance Order - Part 2

Thanks Emilio –

Do you want to set a time and we can do a Zoom or a Teams meeting? Leea Anderson (Helena Pretreatment) and I would like to chat with you to make sure we fully understand requirements, preferred formats, and clarify some terminology. Both Leea and I are free from 11-4 tomorrow. Thanks

Ed Coleman  
(406) 447-8059

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**From:** Llamozas, Emilio <Llamozas.Emilio@epa.gov>  
**Sent:** Wednesday, March 30, 2022 1:49 PM  
**To:** Ed Coleman <ECOLEMAN@helenamt.gov>  
**Cc:** Ryan Leland <RLELAND@helenamt.gov>; Leea Anderson <LANDERSON@helenamt.gov>; Cathy Laughner <cathyl@bkbh.com>; Thomas Jodoin <TJODOIN@helenamt.gov>; Erik Coate <ECOATE@helenamt.gov>; Kim Cross <KCROSS@helenamt.gov>; Garcia, Al <garcia.al@epa.gov>; Livingston, Peggy <Livingston.Peggy@epa.gov>; Pinkston, Daniel (ENRD) <Daniel.Pinkston@usdoj.gov>  
**Subject:** RE: City of Helena Submittal for Paragraphs 89 and 90 of the Compliance Order - Part 2

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Hi Ed,

Thank you for your response. That was very helpful information to understand how the City has been implementing its industrial user inventory and characterization procedure.

The March 1, 2022 submittals and the subsequent March 29, 2022 emails meet the intent of the requirements of paragraphs 89 and 90 of the September 2021 Administrative Order for Compliance.

I will plan on giving you a call tomorrow after 11 am (Mountain) to provide compliance assistance on industrial waste survey procedures.

Thanks,

Emilio Llamozas

(303) 312-6407 phone

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**From:** Ed Coleman <[ECOLEMAN@helenamt.gov](mailto:ECOLEMAN@helenamt.gov)>

**Sent:** Tuesday, March 29, 2022 4:09 PM

**To:** Llamozas, Emilio <[Llamozas.Emilio@epa.gov](mailto:Llamozas.Emilio@epa.gov)>

**Cc:** Ryan Leland <[RLELAND@helenamt.gov](mailto:RLELAND@helenamt.gov)>; Leea Anderson <[LANDERSON@helenamt.gov](mailto:LANDERSON@helenamt.gov)>; Cathy Laughner <[cathyl@bkbh.com](mailto:cathyl@bkbh.com)>; Thomas Jodoin <[TJODOIN@helenamt.gov](mailto:TJODOIN@helenamt.gov)>; Erik Coate <[ECOATE@helenamt.gov](mailto:ECOATE@helenamt.gov)>; Kim Cross <[KCROSS@helenamt.gov](mailto:KCROSS@helenamt.gov)>; Garcia, Al <[garcia.al@epa.gov](mailto:garcia.al@epa.gov)>; Livingston, Peggy <[Livingston.Peggy@epa.gov](mailto:Livingston.Peggy@epa.gov)>; Pinkston, Daniel (ENRD) <[Daniel.Pinkston@usdoj.gov](mailto:Daniel.Pinkston@usdoj.gov)>

**Subject:** RE: City of Helena Submittal for Paragraphs 89 and 90 of the Compliance Order - Part 2

Hi Emilio,

To answer your question 1 – those 28 facilities were sent industrial surveys in 2021. Of those 28 facilities, six of them indicated through the survey that they were discharging wastewater other than domestic wastewater, and were subsequently inspected. You have a copy of those inspections.

Question 2 – Those other 84 facilities were sent surveys prior to 2021 (I believe all in 2020 by Matt Culpo and were on the list you sent us) and a determination was made that the 84 facilities were not potential industrial users subject to the City's pretreatment program.

As far as a phone call tomorrow, I have limited availability, but Thursday and Friday after 11 mountain time will work. Thanks

Ed Coleman

(406) 447-8059

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**From:** Llamozas, Emilio <[Llamozas.Emilio@epa.gov](mailto:Llamozas.Emilio@epa.gov)>

**Sent:** Tuesday, March 29, 2022 3:34 PM

**To:** Ed Coleman <[ECOLEMAN@helenamt.gov](mailto:ECOLEMAN@helenamt.gov)>

**Cc:** Ryan Leland <[RLELAND@helenamt.gov](mailto:RLELAND@helenamt.gov)>; Leea Anderson <[LANDERSON@helenamt.gov](mailto:LANDERSON@helenamt.gov)>; Cathy Laughner <[cathyl@bkbh.com](mailto:cathyl@bkbh.com)>; Thomas Jodoin <[TJODOIN@helenamt.gov](mailto:TJODOIN@helenamt.gov)>; Erik Coate <[ECOATE@helenamt.gov](mailto:ECOATE@helenamt.gov)>; Kim Cross <[KCROSS@helenamt.gov](mailto:KCROSS@helenamt.gov)>; Garcia, Al <[garcia.al@epa.gov](mailto:garcia.al@epa.gov)>; Livingston, Peggy <[Livingston.Peggy@epa.gov](mailto:Livingston.Peggy@epa.gov)>; Pinkston, Daniel (ENRD) <[Daniel.Pinkston@usdoj.gov](mailto:Daniel.Pinkston@usdoj.gov)>

**Subject:** RE: City of Helena Submittal for Paragraphs 89 and 90 of the Compliance Order - Part 2

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Hi Ed,

Thank you for sending the City's updated list of potential industrial users from 2017 to December 2021. The list had 112 new businesses in the City of Helena from September 2017 to December 2021 that the City had identified as possible industrial users. I had a couple of questions on the list:

1- Column G of the spreadsheet has an indicator for the year the facility was surveyed. The spreadsheet indicates that 28 facilities were surveyed in 2021. Does that mean that an industrial user questionnaire was sent or inspection was performed at the 28 facilities in 2021?

2-For 84 of the facilities on the spreadsheet Column G (Year Surveyed) was left blank. Does that mean that the City still needs to survey those facilities? Or does it mean that the City sent industrial user questionnaires to those facilities and made a determination that the 84 facilities were not a potential industrial users which might be subject to the City's pretreatment program?

Also, please ensure that the information in the "Industrial User Survey List from 2017-2021" spreadsheet that you sent me this morning is added to the City's master industrial user inventory list.

I will call you tomorrow to provide some compliance assistance on industrial user inventory procedures.

Thanks,

Emilio Llamozas

(303) 312-6407 phone

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**From:** Ed Coleman <[ECOLEMAN@helenamt.gov](mailto:ECOLEMAN@helenamt.gov)>

**Sent:** Tuesday, March 29, 2022 8:46 AM

**To:** Llamozas, Emilio <[Llamozas.Emilio@epa.gov](mailto:Llamozas.Emilio@epa.gov)>

**Cc:** Ryan Leland <[RLELAND@helenamt.gov](mailto:RLELAND@helenamt.gov)>; Leea Anderson <[LANDERSON@helenamt.gov](mailto:LANDERSON@helenamt.gov)>; Cathy Laughner <[cathyl@bkbh.com](mailto:cathyl@bkbh.com)>; Thomas Jodoin <[TJODOIN@helenamt.gov](mailto:TJODOIN@helenamt.gov)>; Erik Coate <[ECOATE@helenamt.gov](mailto:ECOATE@helenamt.gov)>; Kim Cross <[KCROSS@helenamt.gov](mailto:KCROSS@helenamt.gov)>; Garcia, Al <[garcia.al@epa.gov](mailto:garcia.al@epa.gov)>; Livingston, Peggy <[Livingston.Peggy@epa.gov](mailto:Livingston.Peggy@epa.gov)>; Pinkston, Daniel (ENRD) <[Daniel.Pinkston@usdoj.gov](mailto:Daniel.Pinkston@usdoj.gov)>

**Subject:** RE: City of Helena Submittal for Paragraphs 89 and 90 of the Compliance Order - Part 2

Hello Emilio,

Attached is the updated list of potential industrial users that were screened via the industrial user survey process from 2017 to December 2021. Please let me know if you have any questions. Thanks

Ed Coleman

(406) 447-8059

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**From:** Llamozas, Emilio <[Llamozas.Emilio@epa.gov](mailto:Llamozas.Emilio@epa.gov)>

**Sent:** Wednesday, March 23, 2022 2:51 PM

**To:** Ed Coleman <[ECOLEMAN@helenamt.gov](mailto:ECOLEMAN@helenamt.gov)>

**Cc:** Ryan Leland <[RLELAND@helenamt.gov](mailto:RLELAND@helenamt.gov)>; Leea Anderson <[LANDERSON@helenamt.gov](mailto:LANDERSON@helenamt.gov)>; Cathy Laughner <[cathyl@bkbh.com](mailto:cathyl@bkbh.com)>; Thomas Jodoin <[TJODOIN@helenamt.gov](mailto:TJODOIN@helenamt.gov)>; Erik Coate <[ECOATE@helenamt.gov](mailto:ECOATE@helenamt.gov)>; Kim Cross <[KCROSS@helenamt.gov](mailto:KCROSS@helenamt.gov)>; Garcia, Al <[garcia.al@epa.gov](mailto:garcia.al@epa.gov)>; Livingston, Peggy <[Livingston.Peggy@epa.gov](mailto:Livingston.Peggy@epa.gov)>; Pinkston, Daniel (ENRD) <[Daniel.Pinkston@usdoj.gov](mailto:Daniel.Pinkston@usdoj.gov)>

**Subject:** RE: City of Helena Submittal for Paragraphs 89 and 90 of the Compliance Order - Part 2

**Importance:** High

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Hi Ed,

Thank you for the March 1, 2022 submittals (two emails with four attachments in each email) regarding Paragraphs 89 and 90 of EPA's Administrative Order for Compliance (AO).

I have reviewed the report regarding the City's implementation of its Industrial User Inventory and Characterization Procedures. The report included the inspections performed at six industrial users (Auto B Clean, Blue Collar Diesel, Collision Pro, Diversified Truck Leasing, Energy Laboratories and Rocky Mountain Radiators). The report also included the notifications from the City to the six industrial users listed above of the applicable Pretreatment Standards and the requirements of sections 204(b) and 402 of the Act, and subtitles C and D of the Resource Conservation and Recovery Act.

The City's inspection reports were detailed and the City's notifications to the six industrial users listed above of the industrial user's applicable requirements met the conditions of 40 C.F.R. § 403.8(f)(2)(iii). The report also contained the information required by Paragraph 90(a) through (j) of the AOC for the six industrial users listed above.

Paragraph 90 of the AO states that the City shall provide a report to EPA detailing the City's implementation of the procedures identified in Paragraph 53, i.e., the procedures the City submitted to the EPA on August 27, 2020. As indicated above, what the City provided on March 1, 2022 pertained to six particular Industrial Users. One thing that was missing from the report submitted on March 1, 2022 was the rest of the IU inventory. Paragraph 90 of the AO indicates for each IU included in the IU Inventory, the City shall identify and include in its report the information found in Paragraph 90(a) through (j). This information does not need to be recreated by the City and should include the IU Inventory that the City has been managing since it started its pretreatment program to keep track of IUs in the City. This information is usually found in a spreadsheet with columns to indicated the information identified in Paragraph 90(a) through (j). During the 2017 audit, the City was keeping track of its IU Inventory in a computer program called JobCal program. **Could you please provide the City's updated Industrial User Inventory list?**

If it is helpful, attached to this email is the list of the potential new industrial users identified by the City from September 2017 to July 2020. I received this list from Matt Culpo on July 30, 2020.

Below is some information from the July 30, 2020, email from the City:

"This email and attachments are intended to respond to deliverables 4 and 5 in the list provided below by EPA. Attached, please find the Industrial User Inventory and Characterization Procedures as requested. These procedures address existing and new businesses. The procedures are effective immediately. Additionally, we have screened a list of 1,277 new businesses started in the City of Helena from September 2017 to July 2020 for potential industrial users (attached). The screened list consists of 86 potential industrial users. This City of Helena will send each potential industrial user the Industrial Waste Survey (attached) by October 1, 2020 and request return service by November 1, 2020. The City of Helena will complete review of the surveys and, if needed, inspections by June 1, 2021."

I am also including as attachments some relevant industrial user inventory documents. Below is a summary of the documents:

- 1- "Industrial User Survey List from 2017-20" Excel spreadsheet submitted by Matt Culpo on July 30, 2020.
- 2- "Industrial Waste Survey August 2020 Final" document submitted by Matt Culpo on August 24, 2020.
- 3- "Letters-Survey Oct 2020" document submitted by Matt Culpo on August 24, 2020.
- 4- "IU Inventory Procedures August 2020 Final" document submitted by Matt Culpo on August 27, 2020.

Please feel free to call or email me with any questions.

Thanks,

Emilio Llamozas

(303) 312-6407 phone

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<https://echo.epa.gov/report-environmental-violations>

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**From:** Ed Coleman <[ECOLEMAN@helenamt.gov](mailto:ECOLEMAN@helenamt.gov)>

**Sent:** Tuesday, March 1, 2022 1:09 PM

**To:** Llamozas, Emilio <[Llamozas.Emilio@epa.gov](mailto:Llamozas.Emilio@epa.gov)>; Garcia, Al <[garcia.al@epa.gov](mailto:garcia.al@epa.gov)>

**Cc:** Ryan Leland <[RLELAND@helenamt.gov](mailto:RLELAND@helenamt.gov)>; Leea Anderson <[LANDERSON@helenamt.gov](mailto:LANDERSON@helenamt.gov)>; Cathy Laughner <[cathyl@bkbh.com](mailto:cathyl@bkbh.com)>; Thomas Jodoin <[TJODOIN@helenamt.gov](mailto:TJODOIN@helenamt.gov)>; Erik Coate <[ECOATE@helenamt.gov](mailto:ECOATE@helenamt.gov)>; Kim Cross <[KCROSS@helenamt.gov](mailto:KCROSS@helenamt.gov)>

**Subject:** RE: City of Helena Submittal for Paragraphs 89 and 90 of the Compliance Order - Part 2

Attached you will find the remaining inspections/notification. Please let me know if you have any questions. Thanks

Ed Coleman

(406) 447-8059

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**From:** Ed Coleman

**Sent:** Tuesday, March 1, 2022 1:06 PM

**To:** Llamozas, Emilio <[Llamozas.Emilio@epa.gov](mailto:Llamozas.Emilio@epa.gov)>; Garcia, Al <[garcia.al@epa.gov](mailto:garcia.al@epa.gov)>

**Cc:** Ryan Leland <[RLELAND@helenamt.gov](mailto:RLELAND@helenamt.gov)>; Leea Anderson <[LANDERSON@helenamt.gov](mailto:LANDERSON@helenamt.gov)>; Cathy Laughner <[cathyl@bkbh.com](mailto:cathyl@bkbh.com)>; Thomas Jodoin <[TJODOIN@helenamt.gov](mailto:TJODOIN@helenamt.gov)>; Erik Coate <[ECOATE@helenamt.gov](mailto:ECOATE@helenamt.gov)>; Kim Cross <[KCROSS@helenamt.gov](mailto:KCROSS@helenamt.gov)>

**Subject:** City of Helena Submittal for Paragraphs 89 and 90 of the Compliance Order - Part 1

Hello Emilio and Al,

In accordance with Paragraphs 89 and 90 of EPA's Administrative Compliance Order against the City of Helena, attached you will find a cover letter/report and associated inspections/notifications. Please note that due to the size of the files, I will be submitting this information to you in two separate emails. The City will also mail Emilio a hard copy via certified mail. Please let me know if you have any questions. Thanks

Ed Coleman

(406) 447-8059

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